

Todd R. G. Hill
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In Propria Persona



**UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA**

WESTERN DIVISION

TODD R. G. HILL, et al,

Plaintiffs

vs.

**THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW, et al.,**

Defendants.

CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM

The Hon. Josephine L. Staton
Courtroom 8A, 8th Floor

Magistrate Judge Brianna Fuller Mircheff
Courtroom 780, 7th Floor

**NOTICE OF ERRATA AND SUBMISSION
OF SIGNED DECLARATION IN SUPPORT
OF PROPOSED FIFTH AMENDED
COMPLAINT**

NO ORAL ARGUMENT REQUESTED

**NOTICE OF ERRATA AND SUBMISSION OF SIGNED DECLARATION IN SUPPORT OF PROPOSED
FIFTH AMENDED COMPLAINT**

CASE 2:23-CV-01298-JLS-BFM

**NOTICE OF ERRATA AND SUBMISSION OF SIGNED DECLARATION IN
SUPPORT OF PROPOSED FIFTH AMENDED COMPLAINT**

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

Plaintiff respectfully submits this Notice of Errata to address a clerical oversight in the Corrected Proposed Fifth Amended Complaint submitted via EDSS on May 22, 2025 (Tracking No. EDS-250522-002-0524).

The declaration in support of the complaint was inadvertently submitted without visible signature. Plaintiff hereby submits the signed version of the declaration. No changes have been made to the content of the declaration or any other portion of the Proposed Fifth Amended Complaint.

This correction is submitted solely to ensure the record is complete and accurate, and Plaintiff respectfully requests that the signed version of the declaration be deemed substituted in place of the unsigned version previously submitted.

As the corrected complaint has not yet been docketed, and no party has relied on the previously submitted version, this correction is submitted promptly and without prejudice to the parties. Plaintiff respectfully requests that the signed version of the declaration be deemed substituted in place of the unsigned version for purposes of completeness and accuracy.

Respectfully submitted,

Dated: May 22, 2025

**NOTICE OF ERRATA AND SUBMISSION OF SIGNED DECLARATION IN SUPPORT OF PROPOSED
FIFTH AMENDED COMPLAINT**

CASE 2:23-CV-01298-JLS-BFM



Todd R. G. Hill
Plaintiff, Pro Se

STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1

The undersigned party certifies that this brief contains 192 words, which complies with the 7,000-word limit of L.R. 11-6.1.

Respectfully submitted,



May 22, 2025
Todd R.G. Hill
Plaintiff, in Propria Persona

Plaintiff's Proof of Service

This section confirms that all necessary documents will be properly served pursuant to L.R. 5-3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a

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CASE 2:23-CV-01298-JLS-BFM

document causes a “Notice of Electronic Filing” (“NEF”) to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2) all pro se parties who have been granted leave to file documents electronically in the case pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P. 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.

Respectfully submitted,



May 22, 2025
Todd R.G. Hill
Plaintiff, in Propria Persona

**NOTICE OF ERRATA AND SUBMISSION OF SIGNED DECLARATION IN SUPPORT OF PROPOSED
FIFTH AMENDED COMPLAINT**

CASE 2:23-CV-01298-JLS-BFM

1 **Declaration of Todd R. G. Hill in Support of the Fifth Amended Complaint**

2 I, Todd R. G. Hill, being duly sworn, depose and state as follows:

3
4 **PERSONAL BACKGROUND AND ENROLLMENT AT PCL**

- 5 1. I am over the age of 18, competent to testify, and make this declaration based upon my
6 personal knowledge unless otherwise stated.
- 7
- 8 2. I am the Plaintiff in the case *Hill v. The Board of Directors, Officers, and Agents and*
9 *Individuals of Peoples College of Law*, currently pending in the United States District Court
10 for the Central District of California, Case No. 2:23-cv-01298-JLS-BFM.
- 11
- 12 3. I am a registered law student with Indiana, Texas and California State Bars. I am expected to
13 receive my J.D. from Purdue Law School in 2025.
- 14
- 15 4. I took the February 2025 California Bar Exam.
- 16 5. The facts stated in this affidavit are true and correct to the best of my knowledge and belief.

17 **BACKGROUND**

- 18
- 19 6. I was enrolled as a student at Peoples College of Law (PCL) and completed the required
20 coursework for my degree.
- 21
- 22 7. PCL officials, including Ira Spiro and Christina Gonzalez, have engaged in various acts of
23 misconduct, including but not limited to: a. Manipulating academic records and transcripts;
24 b. Denying access to courses necessary for completion of the program; c. Implementing
25 policies that obstructed my educational progress; d. Retaliating against me for
26 whistleblowing about procedural deficiencies and fraud; e. Engaging in discriminatory
27 practices, including preferential treatment of other students such as Nancy Popp, while
28 denying me comparable accommodations.

1 8. PCL's misconduct has caused me significant harm, including delayed certification,
2 reputational damage, emotional distress, and substantial financial losses associated with my
3 efforts to rectify their misconduct or consequences.
4

5 **RICO ALLEGATIONS & RELATED MISCONDUCT**

6 9. Beginning in 2020, I made repeated requests for accurate academic records and
7 transcripts, including through Gmail communications. I paid transcript fees multiple times but
8 received documents that omitted or misrepresented my academic record..
9

10 10. PCL officials, including Ira Spiro, Adriana Zuniga and Roger Aramayo, have
11 provided inaccurate transcripts on multiple occasions. For example, on or about June 15, 2022, I
12 received a transcript from Ira Spiro via email, which falsely stated that I had not completed
13 certain courses despite my submission of documentation proving completion. Transcripts have
14 also included fractional unit awards without adequate basis, hearing or process.

15 11. I have also received communications via Gmail from PCL officials, including Roger
16 Aramayo, that contained misleading statements about my academic standing. For instance, on
17 October 14, 2023, Aramayo stated via email that the institution was unable to provide accurate
18 transcripts due to administrative delays, despite having been provided with proof of course
19 completion months earlier.
20

21 12. I have preserved copies of these email communications, which demonstrate
22 intentional efforts by PCL officials to obscure or falsify my academic progress and a consistent
23 pattern of misinformation and delay that obstructed my access to graduation and licensure.
24

25 13. Additionally, PCL officials have repeatedly failed to correct errors in my transcripts
26 even after acknowledging mistakes. Although I completed the totality of the required
27 coursework for issuance of a degree, I was not issued a degree.
28

1 14. PCL's failure to correct transcripts has materially impaired my ability to apply for
2 certification with the California State Bar and forced me to complete two years of additional
3 coursework at another institution at great personal and professional cost. Despite submitting
4 completed coursework and proof of compliance, I was unable to obtain the necessary
5 certifications to timely proceed.
6

7 15. As a result of these actions, I have suffered financial losses exceeding \$250,000 in
8 tuition payments, lost work opportunity, reputational harm, and significant emotional distress
9 from being unjustly obstructed from completing my legal education.

10 16. These actions form part of a continuous pattern of fraudulent conduct involving wire
11 and mail communications to deny me access to the benefits and opportunities I am entitled to
12 receive.
13

14 17. I have attached copies of relevant emails and transcripts demonstrating the specific
15 instances of misconduct described above.
16

17 **UNRUH CIVIL RIGHTS ACT VIOLATIONS**

18 18. I have been subjected to discriminatory treatment by PCL on the basis of my race and
19 protected advocacy, which violates the Unruh Civil Rights Act, California Civil Code § 51.
20

21 19. Specific instances of discriminatory conduct include:

22 a. Refusal and failure to correct erroneous transcripts despite my repeated requests;
23

24 b. Arbitrarily denying me access to courses necessary for graduation;

25 c. Retaliating against me for attempting to address these issues and for exercising my rights
26 as a whistleblower.
27
28

1 20. Other students, including Nancy Popp, were promptly provided with corrections to their
2 transcripts and accommodations that were denied to me.

3
4 **NEGLIGENCE AND NEGLIGENCE PER SE**

5 21. PCL and its agents failed to exercise reasonable care in maintaining accurate academic
6 records, providing required courses, and enforcing compliance with relevant regulations.

7
8 22. PCL's violations of statutory and regulatory standards contributed directly to my harm.

9 23. PCL's negligent conduct included: a. Issuing erroneous transcripts; b. Refusing to recognize
10 my completion of coursework despite documentation; c. Implementing policies that unjustly
11 obstructed my educational progress.

12
13 24. PCL's charter was involuntarily revoked, effective May 31, 2024, which I believe is a result
14 that I reasonably believe would not have occurred in the absence of protracted negligence or
15 willful misconduct.

16
17 **NEGLIGENT HIRING, RETENTION, AND SUPERVISION**

18 25. PCL failed to adequately hire, train, supervise, and monitor its personnel, allowing
19 discriminatory and retaliatory practices to occur unchecked.

20
21 26. I believe PCL had a duty to hire, supervise, and train its agents in a manner that ensured
22 their conduct conformed to institutional policies and applicable regulations. If agents failed
23 to comply, PCL was responsible for retraining them or terminating their employment or
24 engagement when necessary to maintain a lawful and compliant educational environment.

25
26 27. PCL's failure to properly supervise its agents contributed directly to the harm I have
27 suffered.

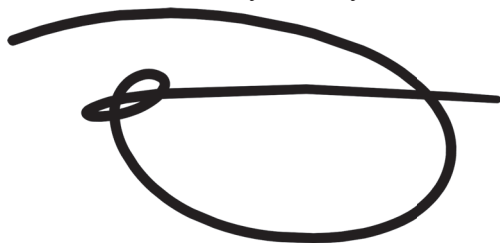
28. The failure to provide me with the fourth year of study as required by its own policies further demonstrates negligent oversight.

29. PCL's negligence in hiring, retention, and supervision allowed employees and agents to engage in misconduct that harmed me.

CLARIFICATION REGARDING STATE BAR OFFICIALS

30. Plaintiff does not assert claims in the Proposed Fifth Amended Complaint against Natalie Leonard, Audrey Ching, Leah Wilson, or other personnel of the State Bar of California, in any capacity. These individuals were previously named as defendants but were dismissed with prejudice in connection with the Fourth Amended Complaint. While Plaintiff's Rule 59(e) motion remains pending, no claims are presently asserted against these individuals in this pleading. Any references to them herein are included solely for factual context relating to regulatory oversight, institutional posture, and the procedural record relevant to the allegations against other parties. Plaintiff does not seek to reinstate liability against these individuals through this amendment. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 22nd day of May 2025, at Belton, Texas.

A handwritten signature in black ink, appearing to read 'Todd R. G. Hill', with a large loop at the end.

Todd R. G. Hill
Plaintiff, Pro Se Litigant